

MAZZOLA LINDSTROM, LLP
1350 Avenue of the Americas, 2nd Floor
New York, New York 10019
646.216.8126
hanoch@mazzolalindstrom.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CM/ECF

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Docket No.: 22-cv-2158

ABSEN, INC.,

Plaintiff / Judgment Creditor & Petitioner,

-against-

LED CAPITAL, LLC, MARCEL DEKEYZER,

Defendants / Judgment Debtors,

-and-

IC TECHNOLOGIES LLC, and MARCEL
DEKEYZER, in his capacity as sole member and
owner IC Technologies LLC,

Respondents.

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Notice of Motion for Default Judgment

Please take notice that based upon the accompanying memorandum of law, the declaration of attorney Hanoch Sheps, the clerk's entry of default dated July 12, 2022 duly entered on the docket, the complaint, and all of the other exhibits hereto, plaintiff / judgment debtor and petitioner Absen, Inc., by and through its attorneys, will move this court on a date to be determined, before the Honorable Kevin McNulty, United States Courthouse, 50 Walnut St, #4015, Newark, NJ 07102, for an order pursuant to Federal Rule of Civil Procedure 55 granting

a default judgment against defendants / judgment debtors LED Capital, LLC, Marcel Dekeyzer, and respondents IC Technologies LLC, and Marcel Dekeyzer, in his capacity as sole member and owner IC Technologies LLC, such order and judgment decreeing as follows:

- a) That defendant / judgment debtor Dekeyzer's interest in IC Technologies be charged with a lien until the judgment held by judgment creditor Absen has been satisfied in full.
- b) That any distributions by IC Technologies due judgment debtor Dekeyzer based upon his interest in IC Technologies shall instead be paid immediately to the judgment creditor Absen c/o its attorneys, Mazzola Lindstrom, LLP, 1350 Avenue of the Americas, 2nd Floor, New York, New York 10019.
- c) That judgment debtors LED and Dekeyzer are hereby prohibited from receiving from IC Technologies any money or assets from IC Technologies, whether by way of loans, fees, wages, salary, payment of the obligations of the judgment debtors, such as the judgment debtors' credit cards, or otherwise.
- d) That should the judgment debtors LED and Dekeyzer receive or otherwise come into possession, by whatever means, of any moneys or assets from IC Technologies, the judgment debtor shall immediately advise judgment creditor Absen of the same, and immediately remit those moneys or assets to Absen c/o its attorneys Mazzola Lindstrom.
- e) That upon judgment debtors LED and Dekeyzer's receipt of any financial information from IC Technologies, including, but not limited to, financial statements, annual statements, notifications of distributions made or to be made, U.S. Internal Revenue Service Form K-1, any other state or federal tax forms or

statements, the judgment debtor shall immediately provide a copy thereof to judgment creditor Absen.

- f) That any violation of this order, whether by a judgment debtor or any other person receiving notice of this order, may be punishable by contempt.

The facts and legal bases for this motion are set forth in the accompanying declaration of facts and memorandum of law.

Dated: New York, New York
July 21, 2022

Respectfully submitted,

MAZZOLA LINDSTROM LLP

/s/ Hanoch Sheps

Hanoch Sheps
*Attorneys for petitioner / judgment-
creditor Absen, Inc.*

1350 Avenue of the Americas, 2nd Floor
New York, NY 10019
Tel: (646) 216-8126
hanoch@mazzolalindstrom.com

To be served upon:

Via Email, Regular Mail and Certified Mail

Marcel Dekeyzer, individually, and in his capacity as managing agent for IC Technologies LLC and as managing agent for LED Capital LLC

64 Rolling Hill Drive
Chatham, New Jersey 07928

Marcel@ic-led.tv

Affidavit of service to be filed in due course